FILED

CLERK, U.S. DISTRICT COURT

12/13/2022

CENTRAL DISTRICT OF CALIFORNIA

BY: VAV DEPUTY

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UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

October 2022 Grand Jury

CR 2:22-cr-00586-ODW

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[18 U.S.C. §§ 208(a), 216(a)(2): Conflict of Interest]

The Grand Jury charges:

COUNTS ONE THROUGH EIGHT

[18 U.S.C. §§ 208(a), 216(a)(2)]

## A. PERSONS AND ENTITIES

UNITED STATES OF AMERICA,

v.

JACQUES POLZIN,

Plaintiff,

Defendant.

At times relevant to this Indictment:

1. Beginning on or about November 21, 2010 and continuing through the present, the Department of Homeland Security, Immigration and Customs Enforcement ("DHS ICE") employed defendant JACQUES POLZIN. Between on or about February 13, 2018 and on or about September 30, 2020, defendant POLZIN worked as a Vehicle Control Officer within DHS ICE, with a salary of at least \$100,000 per year plus benefits.

- 2. As a Vehicle Control Officer, defendant POLZIN was
  responsible for maintaining and safeguarding DHS ICE-owned and
  operated vehicles. Defendant POLZIN obtained estimates for and
  approved vehicle repairs and parts installation for vehicles owned
  and operated by DHS ICE.
  - 3. Company A was a business located in Santa Fe Springs,
    California, within the Central District of California, that provided
    automotive services, such a vehicle repairs, and sold and installed
    automotive parts. As of August 25, 2017, defendant POLZIN's spouse,
    Individual A, owned and operated Company A. Defendant POLZIN had an
    ownership interest in Company A.
  - 4. Beginning on or about December 6, 2019 through April 27, 2021, defendant POLZIN approved service and parts orders for Company A to provide automotive services, such as vehicle repairs and installation of automotive parts, to DHS ICE.
  - 5. Defendant POLZIN did not disclose to DHS ICE defendant POLZIN's or Individual A's financial interest in Company A.

## B. THE CONFLICT OF INTEREST

6. On or about the following dates, in Los Angeles County, within the Central District of California, defendant POLZIN, while employed by the executive branch of the United States Government, namely, DHS ICE, knowingly and willfully participated personally and substantially as a Government officer and employee, through decision, approval, recommendation, the rendering of advice, and otherwise, in an application, contract, claim, and other particular matters in which defendant POLZIN, Individual A, and an organization in which defendant POLZIN and Individual A were serving as an officer, director, or employee, namely, Company A, had a financial interest:

COUNT	TRANSACTION DATE	CLAIM
ONE	December 9, 2019	Claim submitted by Company A for automotive services in the amount of \$445.00 on DHS-ICE vehicle number XXXX4364
TWO	January 3, 2020	Claim submitted by Company A for automotive services in the amount of \$1,777.22 on DHS-ICE vehicle number XXXX4395
THREE	February 11, 2020	Claim submitted by Company A for automotive services in the amount of \$1,635.44 on DHS-ICE vehicle number XXXX6510
FOUR	April 23, 2020	Claim submitted by Company A for automotive services in the amount of \$4,999.12 on DHS-ICE vehicle number XXXX4391
FIVE	April 24, 2020	Claim submitted by Company A for automotive services in the amount of \$2,443.58 on DHS-ICE vehicle number XXXX8482

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COUNT	TRANSACTION DATE	CLAIM
SIX	April 29, 2020	Claim submitted by Company A for automotive services in the amount of \$1,032.56 on DHS-ICE vehicle number XXXX6263
SEVEN	June 4, 2020	Claim submitted by Company A for automotive services in the amount of \$1,356.67 on DHS-ICE vehicle number XXXX6276
EIGHT	August 15, 2020	Claim submitted by Company A for automotive services in the amount of \$1,356.67 on DHS-ICE vehicle number XXXX6276
		A TRUE BILL
		<u>/s/</u>
		Foreperson

E. MARTIN ESTRADA United States Attorney

SCOTT M. GARRINGER

Assistant United States Attorney

Chief, Criminal Division

DAVID T. RYAN

Assistant United States Attorney

Chief, General Crimes Section

DOMINIQUE CAAMANO

Assistant United States Attorney

Environmental and Community

Safety Crimes Section

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